

**To:** Gary Torres[gtorres@blm.gov]  
**Cc:** Edwin Roberson[eroberso@blm.gov]; Anita Bilbao[abilbao@blm.gov]; Kent Hoffman[khoffman@blm.gov]  
**From:** Staszak, Cynthia  
**Sent:** 2017-03-08T16:50:34-05:00  
**Importance:** Normal  
**Subject:** Re: GSENM remarks & proclamation  
**Received:** 2017-03-08T16:51:42-05:00  
[Paleo PFYC GSENM.pdf](#)  
[Paleo PFYC+Inventoried Sites.pdf](#)  
[GSENM Inventoried Cultural Sites.pdf](#)

All:

Attached please find:

1. GSENM Inventoried Cultural Sites. Only about 10% of GSENM has been inventoried. At the scale provided, one dot may cover numerous sites
2. GSENM Potential Fossil Yield Categories. This is a "predictive" look at potential.
3. GSENM Potential Fossil Yield Categories with current inventoried paleo sites. Only about 10% of GSENM has been inventoried. In addition, there are about 25% more inventoried paleo sites that are not yet incorporated in this map, primarily from outside researchers.

Let me know if this is helpful in this format, or would like actual GIS.

**Cindy Staszak**  
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On Tue, Mar 7, 2017 at 9:13 AM, Staszak, Cynthia <[cstaszak@blm.gov](mailto:cstaszak@blm.gov)> wrote:

Gary, Ed & Anita:

There are a few key points, particularly in the Secretary Memo, concerning the objects/resources in the Monument. I will highlight those below, and also a few bullets about

why GIS layers for Archeology and Paleo resources will not provide the information/data you are looking for. I understand that Kent Hoffman was looking at providing the GIS layers for mineral resources.

The Secretary Memo outlines and justifies the boundaries of the Monument as proposed. The Proclamation described the objects that warranted protection ( well beyond just Archeology and Paleontology). The attachments to the Memo listed the historic and scientific objects in the area as well as a bibliography of the sources of information used to make the recommendations. The Memo describes that it is not just the individual objects that were considered for inclusion within the boundaries, but the area necessary to protect the objects, the need to avoid fragmentation of the monument, the conservation needs of the objects, and the need to maintain the objects and their interactions ( ecosystem functionality).

The Secretary Stated:

*"The Antiquities Act' authorizes the President, as part of his declaration of a national monument, to reserve land, 'the limits of which in all cases shall be confined to the smallest area compatible with the proper care and management of the objects to be protected.'" 16 U.S.C. § 431 (emphasis added) • The area proposed for reservation has been carefully delineated, based on review of available information, to meet the goals of effectively caring for and managing the objects in perpetuity.*

*The area includes the archaeologic, biologic, paleontologic, geologic, and historic objects identified in the Proclamation and Exhibits B and C accompanying this letter. Some of these objects are present throughout the entire monument area; others are scattered within it, and several lie along the borders of the area. Many objects also overlap. Thus, the entire area is necessary for protection of the objects. Even if it were possible to reserve a smaller area by isolating certain objects, such a fragmentation of the proposed monument would endanger many of the objects, undermine the purposes of the monument itself, and create substantial impediments to effective management of the monument.*

*The area of the proposed monument is based on the conservation needs of the objects to be protected. Some of the objects identified are present throughout the area, and others cover immense, interconnected areas of land or depend for their scientific value on their location at various sites or elevations. Some of the scientific and historic value of certain objects comes from their scarcity and fragility or the fact that they have remained relatively undisturbed and unchanged. Preservation of such objects (the biologic and archaeological resources are examples) requires, among other things, protection of land surrounding them in order to maintain the relatively remote conditions that have made their continued existence possible.*

*Furthermore, the scientific value of many of the objects within the monument requires preservation of areas large enough to maintain the objects and their interactions. For example, species that exist because of the area's extraordinary geologic and environmental stability are distributed according to the geologic features to which they have adapted. Much of the biologic and other scientific interest in the area results from the variety of geologic substrates across elevational gradients. Many species must range within and through the area and neighboring protected areas to maintain viable populations and their role in the ecosystem. Thus protection of the aggregate area is necessary for proper*

*care of the objects. In addition, a number of the objects are distributed through multiple parts of the area; significant fossils, for example, are distributed throughout the Dakota, Tropic Shale, Straight Cliffs, Wahweap and Iron Springs Formations. Management of a patchwork of reserved lands would be impractical, as it would make it more difficult to care for the objects, reduce options for natural resource management and lead to inconsistent resource management standards for overlapping resources. In short, our analysis indicates that reservation of a smaller area would undermine proper care and management of the monument.*

We have a GIS layer that shows currently inventoried archeological sites. We have only inventoried about 7% of the GSENM. This GIS layer would only show the location of that 7% of the Monument that has sites inventoried. While this GIS layer could be overlaid with mineral potential layers, all it will tell us is that....where currently inventoried sites lie within mineral potential areas. It will not account for the 93% of the Monument that is not inventoried.

A similar situation exists for Paleo resources. Only about 7 % of GSENM has been surveyed for Late Cretaceous fossils....an object in the Proclamation. We can provide a GIS layer of these known resources. But this does little to identify the location of Paleontological resources, when almost 93 % of the Monument has not been inventoried.

I can provide the GIS layers for currently inventoried Cultural and Paleo sites.....but please realize that this will only give you a fraction of the story.....will only identify where the conflicts with known sites might be and will do nothing to identify where the conflicts with the potential sites might be. We are talking about only about 7% of the Monument for both resources.

Let me know if you still want GIS layers for paleo and archeological resources.

Cindy

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On Tue, Mar 7, 2017 at 6:23 AM, Gary Torres <[gtorres@blm.gov](mailto:gtorres@blm.gov)> wrote:

Cynthia, I appreciate the 50 pages of detailed text :)

(b) (5) DPP

Sent from my iPad

On Mar 6, 2017, at 5:24 PM, Staszak, Cynthia <[cstaszak@blm.gov](mailto:cstaszak@blm.gov)> wrote:

Ed:

Attached below are 4 documents, that help clarify/detail the objects in the GSENM proclamation and the reasons for the boundaries as established. They include: The Proclamation, The President's speech given when issuing the Proclamation, the Memo from the Secretary to BLM Director on Management of GSENM (11-6-96) which includes a bibliography of monument resources that was completed in connection with the Proclamation, and a Memo from the Secretary to the President ( 8-15-1996). I would focus your reading on the 8-15-96 memo.

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----- Forwarded message -----

From: **Steiger, John** <[john.steiger@sol.doi.gov](mailto:john.steiger@sol.doi.gov)>

Date: Thu, Dec 11, 2014 at 4:09 PM

Subject: GSENM remarks & proclamation

To: Juan Palma <[jpalma@blm.gov](mailto:jpalma@blm.gov)>, Cynthia Staszak <[cstaszak@blm.gov](mailto:cstaszak@blm.gov)>, Matthew Betenson <[mbetenso@blm.gov](mailto:mbetenso@blm.gov)>

Here is the President's speech and proclamation, from volume 32 of the *Weekly Compilation of Presidential Documents*, in two parts. Feel free to distribute as appropriate. Let me try to find you a clean copy of the Secretary's memo to the President.

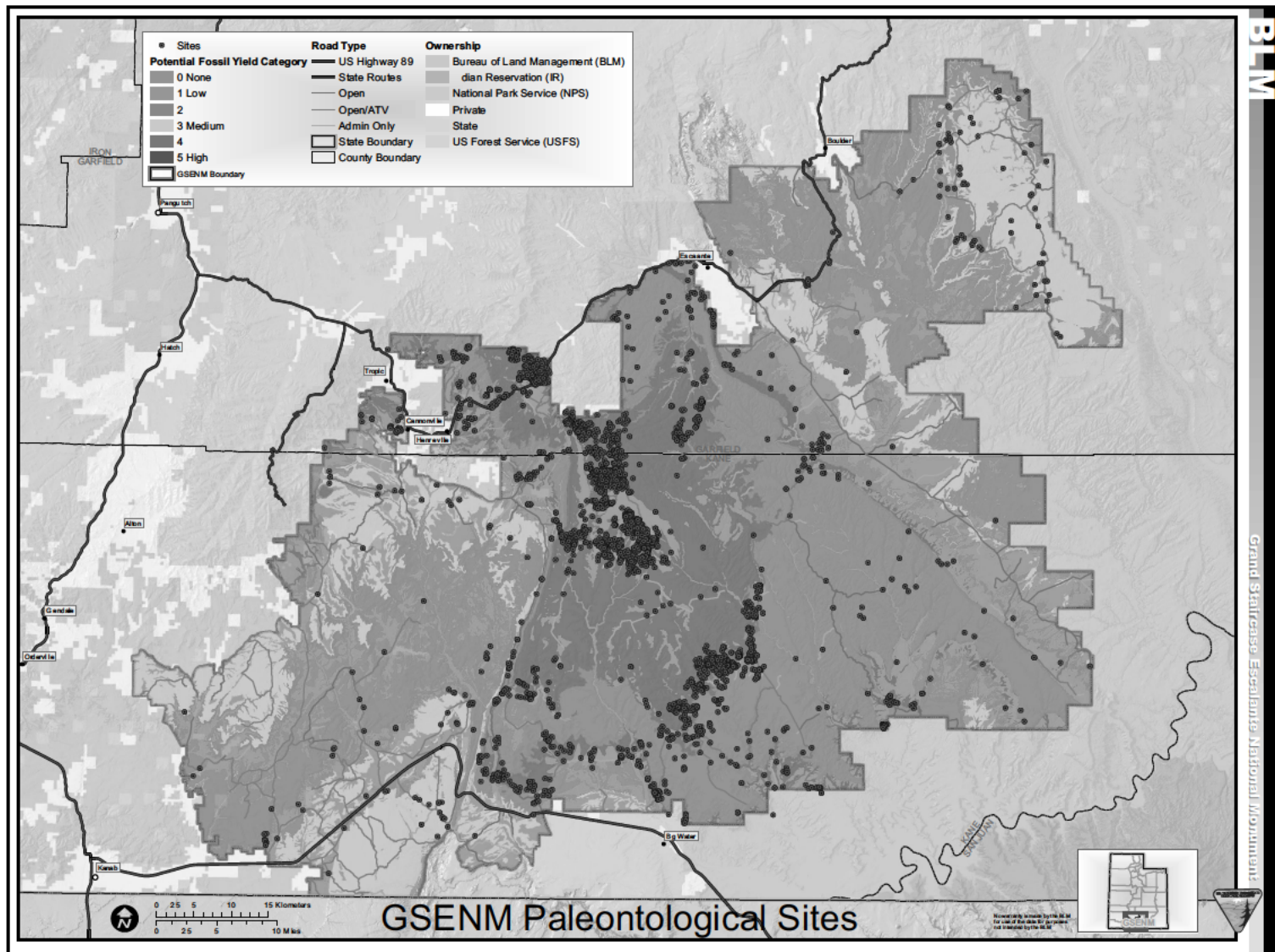
John Steiger  
Acting Regional Solicitor  
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<WCPD-1996-09-23-Pg1785-2.pdf>

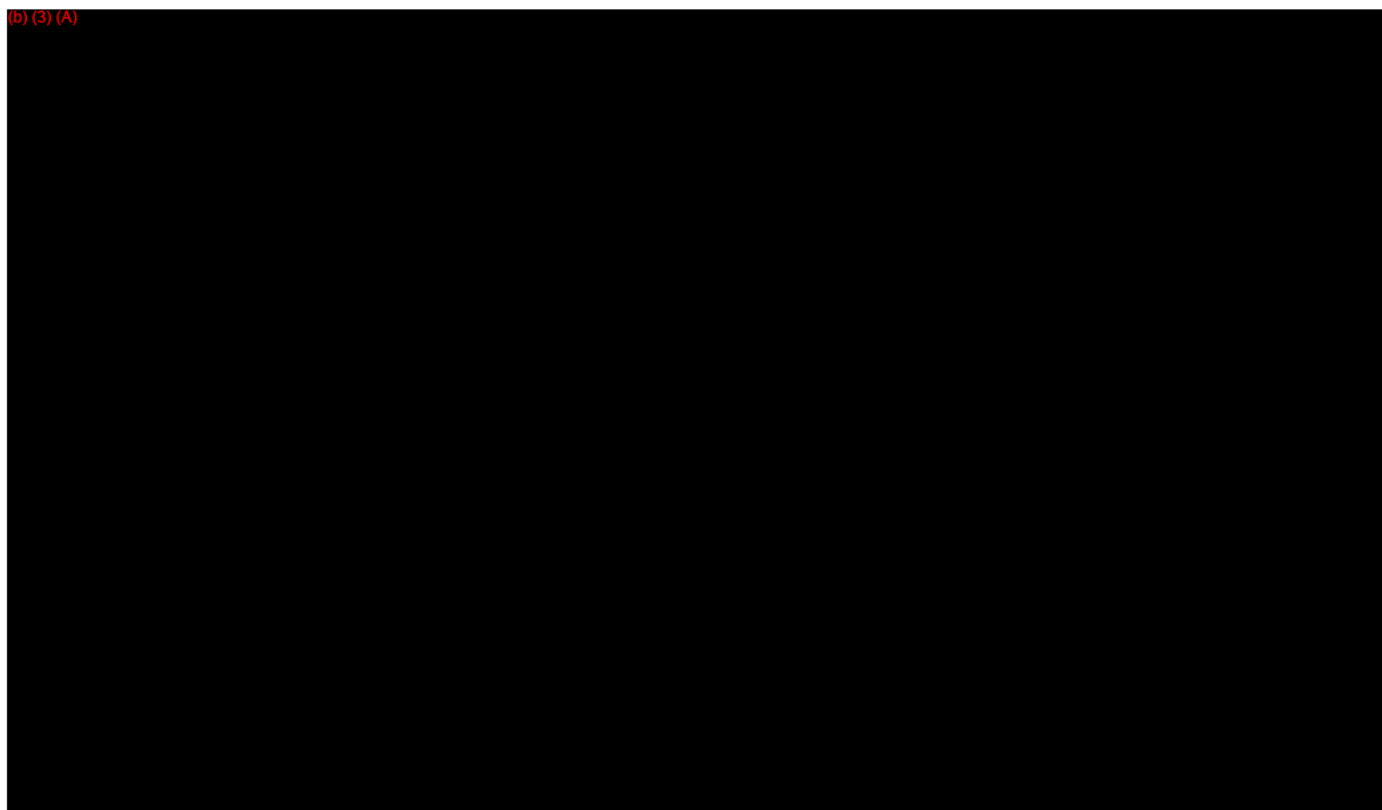
<WCPD-1996-09-23-Pg1788.pdf>

<8-15-96 Memo.pdf>

<11-6-98 Memo.pdf>



(b) (3) (A)



Scale: 1:884,000

Grand Staircase-Escalante National Monument  
Documented Cultural Resource Sites

Notes:  
1) Site locations shown generally depict those areas in which cultural resource inventories have been conducted. Blank areas on this map can be assumed to have similar site densities.  
2) At the presented scale one dot may cover numerous sites.

